

ROB BONTA  
Attorney General of California  
MICHAEL P. CAYABAN (SBN 179252)  
Supervising Deputy Attorney General  
NATALIE E. COLLINS (SBN 338348)  
BARBARA SPIEGEL (SBN 144896)  
Deputy Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 510-3527  
Fax: (415) 703-5480  
E-mail: [Barbara.Spiegel@doj.ca.gov](mailto:Barbara.Spiegel@doj.ca.gov)  
*Attorneys for California Department  
of Resources Recycling and Recovery*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

## Big Lots, Inc.,

Debtor.

CASE NO. 24-11967 (JKS)

## REQUEST FOR SPECIAL NOTICE

## Chapter 11 Case

PLEASE TAKE NOTICE that the California Department of Justice, counsel for the California Department of Resources Recycling and Recovery (CalRecycle), in the above-captioned Chapter 11 case, hereby requests that all notices given or required to be given in this case to creditors, any creditors' committee, or any other party in interest (including all matters described pursuant to Bankruptcy Code section 102 (1) and Bankruptcy Rule 2002(a), (b), (c), (f) and (i), 3017(a), 9007 and 9010) and all papers or other documents filed, served, or required to be served in the above-captioned case, be served on the addressees listed below and that, pursuant to

1 Bankruptcy Rules 2002(g) and 9007, the following be added to the Court's master  
2 mailing list:

3  
4 ROB BONTA  
5 Attorney General of California  
6 BARBARA C. SPIEGEL (SBN 144896)  
7 Deputy Attorney General  
8 455 Golden Gate Avenue, Suite 11000  
9 San Francisco, CA 94102-7004  
Telephone: (415) 510-3527  
Fax: (415) 703-5480  
E-mail: [Barbara.Spiegel@doj.ca.gov](mailto:Barbara.Spiegel@doj.ca.gov)

10  
11 ROB BONTA  
12 Attorney General of California  
13 NATALIE E. COLLINS (SBN 338348)  
14 Deputy Attorney General  
15 600 West Broadway, Suite 1800  
16 San Diego, CA 92186-5266  
Telephone: (619) 738-9140  
Fax: (619) 645-2012  
E-mail: [Natalie.Collins@doj.ca.gov](mailto:Natalie.Collins@doj.ca.gov)

17  
18 PLEASE TAKE FURTHER NOTICE that the foregoing request includes not  
19 only the notices and papers referred to in the rules specified above but also includes,  
20 without limitation, orders and notices of any plans, disclosure statements,  
21 applications, motions, petitions, pleadings, requests, complaints, demands, whether  
22 formal or informal, whether written or oral and whether transmitted or conveyed by  
23 mail delivery, electronic mail, telephone, telegraph, facsimile transmission, or  
24 otherwise.

1 PLEASE TAKE FURTHER NOTICE that neither this request for notice nor  
2 any subsequent appearance, pleading, proof of claim, claim or suit is intended or shall  
3 be deemed or construed as:

4

5 (a) a consent by CalRecycle to the jurisdiction of this Court or any other  
6 court with respect to proceedings, if any, commenced in any case against or  
7 otherwise involving CalRecycle;

8

9 (b) a waiver of any right of CalRecycle to (i) have an Article III judge  
10 adjudicate in the first instance any case, proceeding, matter or controversy as  
11 to which a Bankruptcy Judge may not enter a final order or judgment consistent  
12 with Article III of the United States Constitution, (ii) have final orders in non-  
13 core matters entered only after *de novo* review by a District Court Judge, (iii)  
14 trial by jury in any proceeding so triable in the case or in any case, controversy,  
15 or proceeding related to the case, (iv) have the United States District Court  
16 withdraw the reference in any matter subject to mandatory or discretionary  
17 withdrawal, (v) any and all rights, claims, actions, defenses, setoffs,  
18 recoupments or remedies to which CalRecycle is or may be entitled under  
19 agreements, in law or equity, all of which rights, claims, actions, defenses,  
20 setoffs and recoupments are expressly reserved hereby, (vi) the requirements  
21 for service of process under Federal Rule of Bankruptcy Procedure 7004; or  
22 (vii) the requirements for service of an objection to claim under Federal Rule  
23

24

25

26

27

28

1 of Bankruptcy Procedure 3007, all of which rights, claims, actions, defenses,  
2 setoffs, and recoupments CalRecycle expressly reserves; or  
3

4 (c) a waiver of any objections or defenses that CalRecycle or any other  
5 agency, unit or entity of the State of California may have to this Court's  
6 jurisdiction over the State of California, CalRecycle, or such other agency, unit  
7 or entity based upon the Eleventh Amendment to the United States Constitution  
8 or related principles of sovereign immunity or otherwise, all of which objections  
9 and defenses are hereby reserved.

10  
11 Dated: November 12, 2024

12 Respectfully submitted,

13 ROB BONTA  
14 Attorney General of California  
15 MICHAEL P. CAYABAN  
16 Supervising Deputy Attorney General  
17  
18 */s/ Barbara Spiegel*

19 BARBARA SPIEGEL  
20 *Attorneys for California Department  
21 of Resources Recycling and Recovery*

22 SD2024401729  
23 44278383.docx

24  
25  
26  
27  
28